



August 27, 2019

Mr. Nanao Kachi  
Director, Social and Consumer Policy  
Canadian Radio-television and  
Telecommunications Commission  
1 Promenade du Portage  
Gatineau, Quebec  
K1A 0N2

Dear Nanao:

Re: *Biennial Report on Closed-Captioning Accuracy Rate per Broadcasting  
Regulatory Policy CRTC 2016-435*

*Introduction*

1. Cable Public Affairs Channel Inc./ La chaîne d'affaires publiques par câble inc. ("CPAC") is pleased to provide its third biennial report on the closed captioning accuracy rate standard.
2. CPAC provides coverage of House of Commons and Senate programming in both official languages, control and oversight of which is retained by the House of Commons and the Senate of Canada pursuant to the Commission's exemption order for *Parliamentary and Provincial or Territorial Legislative Proceedings*.
3. CPAC also offers a wide range of complementary public affairs programming in both official languages, consisting of long-form coverage of public hearings, conferences, debates, conventions and other public events and hosted in-depth public affairs programs including *PrimeTime Politics* and *L'essentiel*.
4. CPAC is unique as Canada's only bilingual licensed Canadian broadcaster, offering a completely bilingual programming schedule, with the same programs in English and in French simultaneously.
5. In accordance with CPAC's broadcasting licence [per Broadcasting Decision CRTC 2013-39 and most recent renewal Broadcasting Decision CRTC 2018-329], CPAC captions 100% of its programming based on the language of predominance. If

the principal language spoken is French, then captioning is provided in French, and similarly for English-language programming.

6. Although the Commission has suspended the requirement set out in English-language closed captioning mandatory quality standard #3 until August 31, 2019, we will outline, in the following sections, compliance to the accuracy rate standard for both English and French-language captioning and provide a summary of ongoing efforts to improve the quality and accuracy of closed captioning on CPAC in both official languages.

*Overview of monthly closed captioning accuracy assessment results*

7. CPAC does not undertake any in-house captioning but rather works very closely with two highly competent closed captioning service providers, each dedicated to the captioning of CPAC programming in one of the official languages.

8. CPAC's French-language captioning provider has been engaged to assess two French-language programs containing live content with respect to both the accuracy rate and lag time closed captioning standards on a monthly basis.

9. We are pleased to report that since CPAC's last biennial report or between September 2017 and present, the 85% accuracy rate standard was met consistently in the French-language programs assessed, exceeding the standard on average by 10 points.

10. English-language captioning assessments were also outsourced to the captioning service provider and as noted in CPAC's previous reports, the results differ significantly from the French. Over the last two years, on average, a rate of 91% verbatim accuracy was typically achieved across programs measured. The accuracy rate standard of 95% was achieved in 34% of the programs assessed, most often panel discussions in which the number of guests, cross talk and pace of speech generally necessitated a moderate to high degree of paraphrasing. Such factors including speed of speech have resulted in regulatory acknowledgement the standard accuracy rate may be unattainable, the creation of the "2016 Working Group" to develop and test an alternative method to measure the accuracy of captioning, a suspension of the requirement to achieve the standard until August 31, 2019 and CRTC 2019-9, a call for comments regarding the English-language closed captioning quality standards relating to the accuracy rate for live programming.

11. It should be noted that CPAC has achieved all of the other closed captioning quality standards in both languages and has received no complaints about closed captioning on the television station or its quality during the last two years.

*CPAC's Efforts to Improve the Quality of Closed Captioning*

12. CPAC works very closely with its two captioning service providers and communicates regularly with both in an effort to ensure the best possible experience for viewers who benefit from the availability of captioning.

13. In summary, the following measures have been established with the view of ensuring consistently high quality closed captioning in both official languages:

- Monthly external analysis of captioning accuracy, provided by each service provider;
- Providing captioners with all available information about a program in advance including host scripts, guest names and titles, program summaries and background information on particular programs and content;
- Monthly accuracy reports and any captioning faults are reviewed promptly with providers to determine the source of any issues and work on improvements as required; and
- Making compliance with captioning standards a contractual requirement for captioning providers.

14. CPAC's captioning providers also make every effort to assign personnel on a consistent basis so they become familiar with the style and content of CPAC programs, thus also contributing to improved accuracy.

15. CPAC's Master Control operators monitor outgoing captions as well as the presence of captions on the return feeds of three of CPAC's largest distributors: Rogers Cable, Bell and Shaw Direct. Master Control is staffed 24/7 to address any technical issues that may occur.

16. CPAC believes all efforts noted contribute in an important way to improved captioning quality and CPAC remains committed to finding new ways to increase accuracy.

17. We thank the Commission for this opportunity to report on our captioning compliance results during the last two years.

Yours truly,



Natalie LeMay-Calcutt  
Director, Business Affairs & Compliance

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